



The Commonwealth of Massachusetts
Department of Food and Agriculture
State Reclamation and Mosquito Control Board
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Mr. Jay Wickersham, Director
Executive Office of Environmental Affairs
Massachusetts Environmental Policy Act Office
251 Causeway St Suite 900
Boston, MA 02114

March 4, 2002

Dear Mr. Wickersham,

The State Reclamation and Mosquito Control Board (SRB) voted to request that the Mosquito Control Generic Environmental Impact Report (GEIR) be modified from yearly updates to issuing updates as needed, but no less than every three years.

The concept of possibly issuing annual updates, as originally proposed, was unrealistic. Shortly after the GEIR was accepted we lost the services of the person hired to edit the GEIR. The SRB did not have the resources to further modify or search for available information. In the current fiscal situation there are even less resources available than at any time in the past, certainly less than I have ever seen in my tenure.

The original letter of submission did not say that yearly updates would, in fact be issued, but it was the SRB intention to try. However, there was a qualification to that intention. Updates would be done as "new ideas and approaches to mosquito control become known, new pesticides or equipment come on the market or improved techniques are made available." Further, the letter of submission states: "As these improvements come to the Board's attention, and are reviewed and found to be valid and useful, addendum will be issued in order to continually update the report." The letter of submission did not commit to a yearly update.

While research in mosquito control methods is ongoing nationally, there is little in new equipment, chemicals or techniques that come to the front yearly. Much of what is used, as standard practice nationally is the same as it has been for years. New ideas and approaches to mosquito control do not change significantly from year to year.

The GEIR certificate, as issued, went beyond what the SRB intended and proposed, when it called for yearly updates.

The above lack of resources and significant changes from year to year notwithstanding, there has been progress toward changes that will be added to the GEIR.

The SRB working with researchers from the University of Massachusetts are developing Best Management Practices for balancing mosquito control and wetlands interests. This project, which has been proceeding for some time, is expected to be completed this year.

The SRB has adopted a policy whereby complaints concerning mosquito control from the public or any agency will be addressed upon receipt by the SRB of such complaint, in writing together with any and all supporting information, evidence, statements photos or other documentation. The SRB cannot address such complaints if they are not furnished to the Board.

MA DPH convened work groups last year to study various issues such as pesticides to be used, threshold of action etc. Representatives from various interested groups, such as Audubon, SRB, Fish & Wildlife, Boards of Health, Universities and interested members of the public made up the work groups. While the groups did not, in all cases, issue final reports, much valuable information was assembled by the DPH project, which could be included in future changes of the GEIR.

Changes are being made to the manner in which the public will be notified of the timing and locations of ground adulticide applications.

The question of the appropriate response to West Nile Virus bearing mosquitoes is changing yearly as CDC, MA DPH and others study and learn more. This also will be added to the GEIR once an accepted response policy is finally determined.

An extensive review of methoprene when used as a mosquito larvicide was recently conducted by the Pesticide Bureau staff and reported to the Pesticide Board in various public meetings. This review could also be included in a change to the GEIR..

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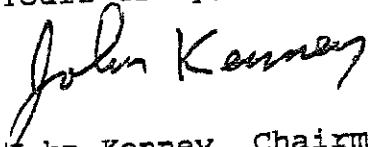
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These are some of the changes which are coming, and which will be added to the GEIR. They are not yet ready, and we recommend that they should be put forth to be added to the GEIR at the same time, rather than piecemeal.

Therefore, the SRB requests that the Secretary's Certificate for the GEIR be amended as above.

Yours truly,



John Kenney, Chairman
State Reclamation and Mosquito Control Board